

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

In re: COINTERRA, INC., Debtor.	§ § § § §	Case No. 15-10109-HCM-7
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WITNESS AND EXHIBIT LIST

Fortis Advisors LLC, as Collateral Agent for the ratable benefit of the Lenders under certain Transaction Documents as defined in the Cointerra, Inc. Security and Pledge Agreement and other applicable Transaction Documents (“**Collateral Agent**” or “**Movant**”), files this *Witness and Exhibit List* in connection with the *Motion for Relief From the Automatic Stay* [Docket No. 28] which is set for hearing on Monday, April 13, 2015, at 9:30 a.m.

WITNESSES

1. Rick Fink, CEO and Managing Director – Fortis Advisors as Collateral Agent.
2. Randy Osherow, Chapter 7 Trustee.
3. The Movant reserves the right to call any impeachment or rebuttal witnesses at the hearing who are not designated herein. Movant further reserves the right to call at the hearing any witness designated by any other party.

EXHIBITS

EXHIBIT	DESCRIPTION OF EXHIBIT	OFFERED	OBJECTION	ADMITTED
1	Rick Fink’s <i>Affidavit in Support of Motion for Relief from the Automatic Stay</i> (with exhibits) filed at Docket No. 28-1			
2	Proof of Claim No. 44 filed by Movant			

EXHIBIT	DESCRIPTION OF EXHIBIT	OFFERED	OBJECTION	ADMITTED
3	Audio Recording of Creditors Meeting held on February 27, 2015			
4	<i>Complaint to Determine Extent, Validity or Priority of Liens or Other Interests in Property of the Chapter 7 Estate of Cointerra, Inc. and Request for Injunctive Relief;</i> Adversary Proceeding No. 15-01029-hcm filed by Future Electronics Corp.			
5	Email from Sunny Kalara, General Counsel of the Debtor, dated December 12, 2014, and attached letter to Collateral Agent by Debtor acknowledging Secured Convertible Notes are in default status			

Movant reserves the right to introduce any pleadings filed in this case and any order entered by the Court which may bear upon the matters before the Court, any document designated by any other party-in-interest, and any documents necessary for rebuttal purposes. Movant also reserves the right to supplement and amend this witness and exhibit list.

Dated: April 8, 2015

Respectfully submitted,

WRIGHT GINSBERG BRUSLOW P.C.

/s/ E. P. Keiffer

E. P. Keiffer (SBN 11181700)
325 N. St. Paul Street, Suite 4150
Dallas, Texas 75201
(214) 651-6500 - telephone
(214) 744-2615 - facsimile
Email: pkeiffer@wgbllawfirm.com

ATTORNEYS FOR COLLATERAL AGENT

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of April, 2015, I electronically filed the foregoing Witness and Exhibit List with the Clerk of the Court using the CM/ECF system which will automatically send email notification to all counsel of record and the Trustee.

/s/ E.P. Keiffer

E.P. Keiffer